# Hollenbeck Canyon Wildlife Area Land Management Plan Mitigated Negative Declaration and Initial Study



Public Outreach Summary and Response to Public Comments

A Public Scoping meeting was held on June 28, 2006. Comments received were taken into consideration during development of the LMP. The Hollenbeck Canyon Wildlife Area (HCWA) Draft Land Management Plan and Mitigated Negative Declaration were released by the Department of Fish and Game (DFG) on October 10, 2006. The public review and comment period extended from October 12, 2006, to November 13, 2006. A Public Meeting was held on October 19, 2006 at the Rancho Jamul Ecological Reserve Conservation Education Center, Jamul, California. The Initial Study/Negative Declaration (ND) was posted at the Jamul Public Library, the DFG South Coast Regional Office and on the Department's internet web page at <a href="www.dfg.ca.gov">www.dfg.ca.gov</a>. It was also circulated to the following public agencies for review: Resources Agency; Regional Water Quality Control Board, Region 9; Department of Parks and Recreation; Native American Heritage Commission; Office of Historic Preservation; Department of Forestry and Fire Protection; Department of Conservation; Caltrans, District 11; and the County of San Diego. Two public agencies responded with comments (Native American Heritage Commission and County of San Diego).

Individuals and/or interest groups, who commented on the Land Management Plan (LMP) and Negative Declaration (ND), along with the subject area of their comments, are listed in the attached table (Table A). Comments came in the form of mailed letters, e-mails, and verbal comments or submitted comment cards received at the October 19, 2006 Public Meeting.

The Department's Land Management Plan Team categorized the 7 comment letters/testimonies received into four subject areas. These include: Public Use (Hunting dog training, hunting dog training ponds, and public access); Construction issues, Native American Heritage issues and Inter-agency cooperation issues.

The Public Use Element in the Land Management Plan and Section II. Property Description, H. "Existing Public Use Features" discusses allowed public uses and associated wildlife area regulations. Through the Land Management Planning effort, the Department analyzed multiple aspects of various activities in determining whether or not a public use is compatible: including whether it is a wildlife-dependent activity, whether or not it is safe for all users, whether it benefits or impacts natural or cultural resources, and whether or not it increases management and/or maintenance costs on

the property.

#### **Public Comments and DFG Responses:**

#### 1. Comments on Public Uses:

Seven specific uses were identified in the comments. Each use is separated out and responded to distinctly by DFG's Land Management Plan team.

#### A. Comments on Public Access:

**1.** Restrictions of use as set forth in the source of acquisition funding and the LMPs conformance to these restrictions should be set forth and discussed in these LMPs.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The acquisition was completed through funding provided by Proposition 12 (Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection (Villaraigos-Keeley Act) Bond Fund), and did not require use restrictions based on that source of funds. No change to the plan is required.

2. HCWA page 117: Avoid the use of barbed wire fencing, even when used to close trail segments. This is not a compatible use with trail users. DPR would advise placement of split-rail fencing or other method of blocking trail such as signage.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. Although not specifically mentioned, barbed wire is not intended nor planned for use on the area. Most barbed wire fences are identified for removal or replacement to protect wildlife and allow better wildlife movement. Trails and access points will be fenced with other than barbed wire as funding allows.

3. This open space is one of the few trails open to horseback riding. It needs to continue to be available to the horse community.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The text of the LMP and Title 14 Regulations includes allowance for horseback riding at HCWA on designated trails. No change to the LMP will be made based on this comment.

#### **B. Comments Regarding Hunting**

1. Title 14 California Code of Regulations issues: Request to change the text of the LMP to refer to California Code of Regulations Title 14 rather than specifying months hunting dog training is allowed at HCWA in the event that Title 14 may be changed in the future; request to change the text of the LMP to refer to California Code of Regulations Title 14 rather than specifying birds allowed for hunting dog training. Allow all species to be hunted as allowed under current law and control under Regional Manager Authority. Modify Title 14 to allow hunting of any/all species on any/all lands purchased where Public Use is, or was, one of the purposes of acquisition or management.

#### **DFG Response:**

General Title 14 public use regulations (including hunting regulations) are site specific in response to conditions and situations unique to each site, both for Ecological Reserves (ER) and Wildlife Areas (WA) throughout the state. This is the purpose for Title 14, Sections 550, 551 for WAs and Section 630 for ERs. The purpose of acquisition is included in the Land Management Plan (LMP) and is the premise establishing allowable uses in the LMP and Title 14 regulations.

Not every site is conducive to hunting of all legal species, nor is every site conducive to equestrian use, bicycles, boating, etc. Each site is evaluated to a limited extent prior to acquisition, and then assessed again once escrow closes. Evaluations occur again during the Land Management Plan process and during

regular Title 14 regulation cycles. Both the LMP and Title 14 have adaptive management aspects, meaning that they can be modified based on changing conditions or in response to new knowledge or information.

The LMP effort generally includes a biological component (habitat assessment and some focal species surveys) to help determine appropriate uses and designated areas for those. Site evaluations also include measures needed to protect habitat, site security issues, management needs, monitoring needs, staffing and available funding resources, goals for site usage to retain a quality wildlife experience, and public access and health and safety issues.

The Department has assessed the local conditions on the wildlife area and determined that potential impacts could be more easily avoided if area specific regulations were adopted at HCWA. The Department developed the regulations for HCWA to protect existing populations of native species and to be consistent with the "no non-native species introduction policy" on the adjacent Rancho Jamul Ecological Reserve (RJER).

Current restrictions on various bird species reduces the potential impacts associated with the introduction of breeding population of non native species onto the wildlife area and will be retained. Seasonal restrictions on hunting dog training avoids impacting ground nesting birds found in the hunting dog training areas and will be retained. In addition, California Code of Regulations Title 14 supercedes the authority of the LMP. If Title 14 is changed in the future, those future regulations would apply to HCWA. The LMP will be subsequently updated to reflect any future specific regulations that apply to HCWA, such as allowable dates of hunting dog training. The LMP has been changed to outline this process and authority. The Regional Manager has the authority to make further restrictions regarding hunting on the wildlife area to protect wildlife and habitat on the wildlife area.

**2.** Explain how hunters (shotgun blasts) and hunting dogs off-leash during hunting season will have no affect on wildlife and plant life when they track off-trail.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. Allowed uses are not based on a no effect determination, but on a less than significant effect determination. Hunting occurs outside of the breeding and nesting seasons of sensitive animal species, and the impacts to wildlife and habitat are minimal, as identified in the Department's Environmental Documents on hunting (California Department of Fish & Game (CDFG). 2004c. Resident Game Bird Hunting Final Environmental Document. Calif. Dept. Fish and Game. 182 pp. and 2004b Resident Small Game Mammal Hunting Final Environmental Document. The Resources Agency, Department of Fish and Game. 139 pp.).

**3.** Add hunting for coyotes, squirrels, crows, and deer. Expand upland game bird hunting in HCWA AND RJER. Use hunting as a management tool.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The LMP has been changed to include coyotes and crows in the list of huntable species. The Department believes that the squirrel population is currently too low to provide a sustainable hunt. Population surveys for deer will be conducted to determine if there is a sufficient population that would allow for a sustainable hunting population. Should future Department evaluations show that the squirrel population has increased and reached sustainable levels, and/or if deer are present in sufficient numbers, either or both species could be added to Title 14 and a revised LMP in the future. Opportunities to harvest additional species will be assessed as population information is updated, potential safety issues are resolved and habitat quality allows.

One of the initial purposes of the acquisition of HCWA was to provide additional hunting opportunities. Should the possibility to expand hunting arise in the future, considering a balance of all goals and uses, the Department will work to provide additional hunting opportunities. RJER was acquired mainly to provide for habitat restoration however hunting is allowed on a more limited basis there

than at HCWA. Hunting may be used as a management tool should population levels of species become excessive, however hunting is currently regulated to prevent over harvest rather than to cull populations.

**4.**Request to keep HCWA open to equestrian use, hiking, and mountain biking but close it to hunting.; close Hollenbeck to hunting except for special events

#### **DFG Response:**

The Department acknowledges this comment. DFG intends to continue to provide opportunities for hunting and hunting dog training within HCWA. One of the initial purposes of the acquisition of HCWA was to provide additional hunting opportunities. DFG also intends to continue to provide multiple wildlifedependent recreational opportunities including wildlife viewing while hiking, horseback riding, or mountain bike riding within HCWA. Wildlife viewing is a wildlife dependent activity, whereas the act of riding a bike or a horse is not always for the purpose of viewing wildlife. The Department will monitor these and all activities to ensure maximum compatibility with our LMP goals and objectives. Most of these existing authorized uses, including hunting, were already taking place on the land prior to the State's ownership and the Department's management of HCWA.

**5.** Concern regarding potential injuries to horses and non-hunting users due to gun accidents.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The LMP includes safety goals and signage goals to communicate with visitors to identify hunting seasons and regarding potential risks. During implementation of the LMP, entrance signs will be posted to advise all visitors that they enter at their own risk and to be cautious and alert due to the many potential hazards within HCWA. All hunters are required to carry proper licenses and stamps appropriate to their hunting activities. Hunters are expected to hunt ethically, carefully and follow all restrictions and regulations. The Department has not received any

complaints or reports of gun accidents or illegal behavior by hunters within the HCWA. If illegal or careless hunting behavior is taking place, please report it immediately to the Caltip hotline 1-888-DFG-CALTIP or 1-888-334-2258.

#### C. Comments Regarding Hunting Dog Training and Training Areas:

**1.** Request to edit MND/IS regarding control of dogs. Commenter would like DFG to add "whistle and/or hand signal" to voice command.

#### **DFG** Response:

The Department acknowledges and appreciates this comment. The Department has determined the existing regulation is adequate.

**2.** Comments related to dog training: Request to add the word "hunting" before each occurrence of the word "dog."

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The text of the MND/IS has been modified to indicate that wherever hunting dog training facilities or activities are referenced, the word "hunting" has been inserted. Page 35 of the LMP has been modified to indicate that "dog training" refers to "hunting dog training"

**3.** Comments related to ponds: Request to edit the MND/IS to identify multiple stock ponds. Revise goals to include development of more than one training pond and that pond size be a minimum of one acre and up to two acres. Request that 5 ponds be restored and new ponds developed, and that a third hunting dog training area be developed for water training.

#### **DFG** Response:

The Department acknowledges and appreciates these comments. The LMP (pg. 100, 112, 123, 137, 143, Appendix F) and MND/IS (pg. 2, 6, 29, 40) have been modified to reflect the existence of several dry ponds and provides the possibility for one or more to be restored for hunting dog training opportunities. The revised

text states that habitat evaluations and an environmental review will be completed prior to the restoration of other abandoned ponds. The Department does not intend to enlarge the existing dry ponds at this time; however the one to two acre size preference by hunting dog trainers will be taken into account when decisions about the ponds are made.

**4.** Comment requests the development of hunting dog training fields adjacent to proposed training ponds listed in LMP goals. Request to show hunting dog training area on Figure 4.

#### **DFG** Response:

The Department acknowledges and appreciates these comments. Figure 4 in the MND/IS and figure 11 in the LMP have been modified to show the general location of the additional proposed hunting dog training area adjacent to the proposed training ponds. The area will be further defined as part of the specific project plan for the dog training area.

**5**. Mitigate loss of access to training ponds if future negative impact on MSCP species occurs.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. Under CEQA, no mitigation for loss of access to training ponds is required. While DFG intends to work with hunting dog trainers to provide land and water areas for hunting dog training (see also response to Comments 1.B.2 and 1.B.3), the Department is not under legal obligation to provide access to training ponds as compared with legal requirements under the Endangered Species Act, for example. No change to the LMP will be made based on this comment.

**6**. Request to move dog training to Rancho Jamul Ecological Reserve.

#### **DFG Response:**

The Department has allowed special event hunting dog training in the past at

RJER, and may allow special events in the future, however the greater public access at HCWA provides a better opportunity for hunting dog training and is appropriate for the purpose for which the wildlife area was established.

**7.** Field Trial issues: Request to remove categorical exclusion of field trials, dog trials should be allowed with Department approval.

#### **DFG Response:**

The Department acknowledges and appreciates these comments. The Department has determined that the activity is not wildlife dependent. In addition, the potential effects of dog trials would likely constitute a "project" and therefore require full CEQA review of the activity. Therefore we cannot allow this use at this time.

**8.** Request to remove reference to hunting license for dog training.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. Visitors using live birds or shotguns with hunting licenses are permitted to train hunting dogs in designated areas from September through February. Those training hunting dogs without using live birds or shotguns are not required to carry a hunting license. Text of the LMP has been modified to reflect this clarification.

#### 2. Construction Issues

- A. Comment Regarding Lack of Specific Information Concerning Direct and Indirect Impacts of the Proposed Construction Projects.
  - 1. Conclusions that impacts are less than significant when mitigation is incorporated cannot be supported.

#### **DFG Response:**

The Department respectfully disagrees with this comment. The LMP was

prepared as a guide for the California Department of Fish and Game in the management, maintenance, and restoration of biological resources in the HCWA. As a "guidance" document, the LMP identifies management goals the Department will implement in the future. Future construction projects identified in the LMP are listed on page 2 of the MND/IS. They are:

- Oreate a pond for hunting dog training by augmenting normal rainfall by pumping well water into an abandoned approximately 0.4-acre stock pond near the former Honey Springs Ranch home site. As restoration of other abandoned stock ponds is pursued, an evaluation of the habitat in the surrounding area will be conducted and the restoration will be subject to environmental review pursuant to CEQA.
- Install approximately 2,300 feet of 2-inch water line from the nearest well to serve the former stock pond.
- o Create a new approximately 1-acre unpaved parking area in a disturbed area near the former Honey Springs Ranch home site. Install a vehicle gate and horse gate near the new parking lot to provide additional access along an existing road to the neighboring hunting dog training pond and trails in this area. Authorized members of the Public will be provided an entry code to access the pond for hunting dog training.
- Install a horse gate in the northern boundary fence where a trail enters the site.

The identification of direct and indirect impacts in the MND/IS was based on the available information about construction activities contained in the LMP. The hunting dog pond is an existing structure located in a disturbed area, and the adjacent unpaved parking area is also within a disturbed area. The water line to serve the pond will be installed within an existing roadbed. The horse gate will be located in chamise chaparral habitat. No threatened or endangered species are located in these areas. The preparation of design level plans for each of the construction projects will include site specific impact analysis and mitigation measures if determined necessary.

Pages 31-38 of the MND/IS, include biological and cultural mitigation measures

that would reduce potential impacts to a less than significant level. These measures specify that biological and cultural resource surveys be conducted for construction related projects, implementation of Best Management Practices, restoration of disturbed habitat, performing construction during non-breeding seasons of sensitive species, and placing new facilities in disturbed habitat whenever possible. The Department believes that these mitigation measures are sufficient to insure that any impacts that may be associated with the construction projects will be reduced to a less than significant level. Nevertheless, subsequent environmental review will be conducted for specific construction projects at the time they are designed. If it is found that these mitigation measures are not adequate to address potential impacts of the proposed project, additional measures will be incorporated to eliminate or reduce the impacts to a less than significant level.

#### B. Comments regarding construction specifics

1. MND/IS lacks specific information regarding the qualitative and quantitative direct and indirect impacts of the proposed construction projects on the property. Without this information, the conclusion that impacts are less than significant when mitigation is incorporated cannot be supported.

#### **DFG Response:**

Please see response to Comment 2.A.1.

2. General Aesthetic Issues including: elimination of portable toilets from Rancho Jamul Road parking area, replace existing fencing with similar new fencing, paint buildings using surrounding area colors, build ranch style facilities, signs should be of fitting style and color, no additional lighting, low-sodium lights for construction, and leave parking lots unpaved.

#### **DFG** response:

The Department considers all of these recommendations to be reasonable and will refer to them in planning maintenance and capital outlay projects. Portable toilets will not be regularly placed at the HCWA's Rancho Jamul Road parking area, but may be placed during special events and removed afterwards.

#### 3. Native American Heritage Issues

#### A. Comments regarding Native American Historical Commission issues

- **1.** Contact the appropriate California Historic Resources Information Center (CHRIS). The record search will determine:
  - a. If a part of the entire APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded in or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The Department contracted with a qualified archaeologist, Dr. Susan Hector, for the preparation of the Hollenbeck Canyon Wildlife Area Archaeological Management Section of the LMP. In addition, A Record Search was obtained from the South Coastal Information Center as part of that effort. Numerous cultural sites are identified on the property and will be avoided during construction activities. The projects identified in the LMP are all in previously surveyed areas and it is not anticipated that they will have any significant impacts on cultural resources. Any future proposed projects in areas not previously surveyed will require a full cultural investigation and an impact analysis under CEQA.

2. If an archaeological inventory survey is required, the final stage is the

preparation of a professional report detailing the findings and recommendations of the records search and field survey.

a. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. All sites have previously been recorded and information properly kept in confidential addendums, and will not be available for public disclosure.

- 3. Contact the Native American Heritage Commission (NAHC) for:
- a. A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: <u>USGS 75 minute quadrangle citation with name, township, range and section</u>;
- b. The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with <u>Native</u> <u>American Contacts on the attached list</u> to get their input on potential project impacts, particularly the contacts on the list.

#### **DFG** Response:

The Department acknowledges and appreciates this comment. EDAW Consulting contacted NAHC and received a reply from Carol Gaubatz of NAHC that a significant cultural sacred site was listed for the area and provided a listing of Native American contacts who may have knowledge of sites. EDAW contacted those listed by mail and phone to request comments or concerns

about the project and received replies indicating there were no significant issues with the project.

- **4.** Lack of surface evidence of archeological resources does not preclude their subsurface existence.
- a. Lead agencies should include in their mitigation plan provisions for the identification and evaluation accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- b. Lead agencies should include in their mitigation plan, provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The Department has included such provisions in the plan. Please see page 37 of the MND/IS and pages 33-35 and 126-135 of the LMP.

- **5.** Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.
- a. CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.
- b. Health and Safety Code §7050.5, Public Resource Code §5097.98 and §15064.5(d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains

in a location other than a dedicated cemetery.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. No likelihood of presence of Native American human remains was identified within the Project Area. The Department has included provisions in the plan in case any are incidentally discovered in the future.

**6.** Lead agencies should consider avoidance, as defined in §15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

#### **DFG Response:**

The Department has included such provisions in the plan.

#### 4. Comments on Interagency and Non-Government Organization Cooperation

#### A. Comments regarding interagency cooperation issues:

1. Inter-jurisdictional cooperation and coordination is essential so that the San Diego County Department of Parks and Recreation (DPR) and DFG can resolve the conflicts that are created between the County Trails Program and the LMPs. DPR and DFG staff should meet to resolve these issues.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The MND/IS identifies the inconsistency of trails and includes a mitigation measure (see Land Use and Planning discussion page 42). The Department will continue ongoing discussions with the County of San Diego on trail issues.

**2.** The LMP states that it is consistent with the County of San Diego MSCP. However, it fails to include the fact that MSCP allows for passive recreation, specifically multi-use trails. In addition, hunting is not a

compatible use on County of San Diego MSCP Preserve lands.

#### **DFG Response:**

The Department acknowledges this comment. The Department indicated on page 6 of the MND/IS that the purchase of the property was evidence of our commitment to NCCP planning efforts and noted that the property was located within the MSCP planning area. However, this property is not managed under the Framework Management Plan for Preserve lands. The Framework Management Plan only pertains to those lands listed under section 10.9 of the MSCP implementing agreement, which are owned by the County and identified as areas to be preserved, or lands acquired as mitigation pursuant to the MSCP. HCWA is not included in this list of lands. Hunting has been determined by the Department to be a compatible, wildlife-dependent activity at HCWA.

**3.** County Department of Parks and Recreation (County DPR) is working with California State Parks on rerouting significant sections of the California Riding and Hiking Trail. This reroute is vital to County's regional trail system and is necessary to ensure public safety. Both RJER and Hollenbeck Canyon have significant sections of the trail. Sections along Otay Lakes Road and Highway 94 must be rerouted and RJER can easily provide the reroutes utilizing existing ranch roads and trails.

#### **DFG Response:**

Please see response to comment 4.A.1.

**4.** DFG should coordinate with County DPR staff on monitoring for Quino checkerspot butterfly to avoid duplication of effort.

#### **DFG Response:**

The Department is certainly willing to work with County staff to monitor sensitive species and avoid duplication of effort. Avoidance of duplication of effort is assured, however, by the fact that County DPR staff or contractors must obtain permission to survey Quino checkerspot butterflies on DFG lands. Such surveys would fall outside of normal public activities permitted on the area, and thus

requires special authorization.

# B. Comments regarding coordination with Non-Governmental Organizations (NGOs)

1. Request to include San Diego County Wildlife Federation as one of the example NGO's (LMP page 146).

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The LMP has been changed to include the San Diego County Wildlife Federation as an example NGO.

**2**. Establish point of contact with Rancho Jamul Estates – send notices of scheduled hunting days

#### **DFG** response:

The Department will include Rancho Jamul Estates on all lists of NGOs developed for public notifications. We will also post general hunting schedule periods at all access points into the wildlife area and provide a copy of the notices to the entrance kiosk at Rancho Jamul Estates.

#### 5. General Comments on the LMP

**A.** Figure 14 of HCWA LMP lacks sufficient detail to be informational for reader.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The purpose of the figure was to show that there were a number of sensitive species occurring on the property and provide their general distribution in the planning area at the time the plan was prepared. The Department believes that the detail provided was sufficient to convey this information.

**B.** Discuss how planting non-native plants such as cereal grass and safflower to attract game species such as dove and quail is compatible with the MSCP Subarea Plan, specifically Land Uses Allowed within the Preserve (Section 1.9) and the MSCP Framework Management Plan.

#### **DFG Response:**

This property is not managed under the Framework Management Plan. Please see response to Comment 4.A.2.

**C.** HCWA LMP Bio 2.2.3a: Text should refer to MSCP Framework Management Plan and MSCP Monitoring Protocols and acknowledge that afore-mentioned monitoring protocols are currently being updated.

#### **DFG Response:**

Please see Comments 4.A.2. However, the monitoring protocols used at HCWA will follow the most recent adopted protocols for the targeted species by regulatory agencies or by the MSCP, whichever is appropriate.

**D**. Eliminate illegal alien traffic.

#### **DFG Response:**

The Department acknowledges and appreciates this comment. The Department opposes any illegal activity on State land and has included in the LMP goals, continued coordination with Homeland Security – Border Patrol. No change to the LMP will be made based on this comment.

**E.** Concern about HCWA being entered by off-road vehicles.

#### **DFG Response:**

The Department prohibits off-road vehicles within HCWA. Violations have taken place and some entrances have been modified to prevent entrance by off-road vehicles. Violators can be prosecuted to the extent of the law if apprehended. Areas that have been disturbed are intended to be restored. This issue has been addressed under Public Use Element Goals (Pub 1.11) therefore; no change to

the LMP will be made based on this comment.

**F.** Request to provide a no-hunting buffer zone around Rancho Jamul Estates.

#### **DFG Response:**

A no hunting zone (LMP Figure 11) currently serves as a buffer around the Rancho Jamul Estates, and hunters are legally required to remain 150 yards away from occupied dwellings while hunting. If hunters are coming too close to the homes, the Department should be notified at 1 888 DFG-CalTIP. Additionally, the Department will work with homeowners or the association to place signs to assist in informing hunters of the buffer if existing signage is insufficient.

LIST	OF	PERSONS,	ORGANIZATIONS,	AND	PUBLIC	AGENCIES	THAT
COMN	/ENT	ED ON THE D	RAFT MND/IS				

**FEDERAL AGENCIES:** 

None

STATE AGENCIES:

Native American Heritage Commission

COUNTY, CITY, AND OTHER LOCAL AGENCIES:

County of San Diego, Department of Parks and Recreation

**ORGANIZATIONS:** 

San Diego Retriever and Field Trial Club, Inc.

San Diego Hunting Retriever Club, Inc.

North American Versatile Hunting Dog Association

San Diego County Wildlife Federation

**INDIVIDUALS:** 

Peter Shenas

Robert Hobbs

Robert Pianavilla

Nancy Owens

Howard Whitfield

Veronica Hoban

#	LMP (Pg)	MND (Pg)	Comment	County of San Diego	Native American Heritage Commission	San Diego Retriever (Erwin)	San Diego Retriever (Stewart)	N. Amer Hunt Dog Assoc (Smith)	SDC Wildlife Federation	Hobbs	Whitfield	Hoban	Pianavilla	Owens	Shenas
1.A.1	156		Uses restricted by funding source	X											
1.A.1	130	29	Avoid barbed wire fencing	X											
1.A.3	148	41	Conflict with Community Trails Plan	X											
1.B.1	43	8	Change dog training period from Sept-Feb to Title 14 regs			X		X							
1.B.1	38, 43	8	Change regs to allow use of other game bird species for dog training			X		X							
1.B.1	38	7	Change Title 14 to allow hunting of any/all species as allowed under current law. Control through Regional Manager authority						X						
1.B.2		34	Explain how hunting and dogs off leash have no affect on wildlife	X								X			
1.B.3	40	7	Add hunting for coyotes, squirrels, crows, deer							X					
1.B.3	38, 121	7	Expand upland game bird hunting in HCWA & RJER										X		
1.B.3	121	7	Hunting as a management tool						X						
1.B.4		7	Close HCWA hunting								X				
1.B.4	44, 124	7	Close HCWA to hunting except for special events									X			

#	LMP (Pg)	MND (Pg)	Comment	County of San Diego	Native American Heritage Commission	San Diego Retriever (Erwin)	San Diego Retriever (Stewart)	N. Amer Hunt Dog Assoc (Smith)	SDC Wildlife Federation	Hobbs	Whitfield	Hoban	Pianavilla	Owens	Shenas
1.B.4	9, 37, 38, 39, 41, 44	2, 8	Allow equestrian, hiking, biking in HCWA								X				
1.B.4	120, 122, 132	8	Maintain horse trails											X	
1.B.5	37, 119, 121, Append. F.14	7	Concern about hunting gun accidents												
1.C.1	43	5	Add "whistle and/or hand signal" to voice command			X			X						
1.C.2	9, 28, 35, 36, 43 122, 123,	2, 8, 30, 33, 34, 40	Add "hunting" when the word "dog" appears			X			X						
1.C.3	100, 112, 123, 137, 143	2,6,40	Reword to address multiple ponds			X	X		X						
1.C.3	100, 112, 123, 137, 143	2, 6, 40	Repair a minimum of 5 dry ponds are located near old homes north of honey Springs Rd. and develop new ponds in this area			X	X	X	X						
1.C.3	100, 112, 123, 137, 143	2, 8, 30, 33, 34, 40	Support existing dog training, request third area to be developed for water training.				X								
1.C.3	100, 112, 123, 137, 143	40	Improve conditions for all animals – fill ponds, guzzlers, feed plots										X		
1.C.4	123	Fig. 4	Provide dog field work area adjacent to ponds					X							
1.C.4	Fig 11	Fig. 4	Show dog training area contiguous to training ponds			X		X							
1.C.5			Mitigate loss of access to training ponds if future negative impact on MSCP species occurs			X	X		X		**				
1.C.6			Request to move dog training to								X				

#	LMP (Pg)	MND (Pg)	Comment	County of San Diego	Native American Heritage Commission	San Diego Retriever (Erwin)	San Diego Retriever (Stewart)	N. Amer Hunt Dog Assoc (Smith)	SDC Wildlife Federation	Hobbs	Whitfield	Hoban	Pianavilla	Owens	Shenas
			RJER												·
1.C.7	37, 43	8	Remove categorical exclusion of field trials			X			X						
1.C.7	37, 43	8	Dog trials to be allowed with Dept. approval			X		X	X						
1.C.8	43		Remove reference to hunting license for dog training			X									
2.A.1			MND lacking information	X											
2.A.1			Conclusions of no significant impacts cannot be supported	X											
2.B.2		29	No port-a-potties at entrance to Rancho Jamul Estates or near Hwy 94												X
2.B.2	135, 136	29	New fencing similar existing fencing												X
2.B.2	135	29	Paint buildings using surrounding area colors												X
2.B.2	135	29	Build ranch style facilities												X
2.B.2	135	29	Signage should be of fitting style and color												X
2.B.2	110, 211	29	No additional lighting												X
2.B.2	110	29	Low-sodium lights for construction												X
2.B.2	9, 136	2, 4, 6, 29	Leave parking lot unpaved												X
3.A.1	134	37	California Historic Resources Information System		X										
3.A.2	135	36	Archaeological Inventory Survey		X									_	
3.A.3	133	37	Native American Heritage Commission notification		X										

#	LMP (Pg)	MND (Pg)	Comment	County of San Diego	Native American Heritage Commission	San Diego Retriever (Erwin)	San Diego Retriever (Stewart)	N. Amer Hunt Dog Assoc (Smith)	SDC Wildlife Federation	Hobbs	Whitfield	Hoban	Pianavilla	Owens	Shenas
3.A.4	37, 130, Appendix E	36	Subsurface existence of artifacts		X										
3.A.5	130, Appendix E	36	Provisions for discovery of human remains or graves		X										
3.A.6	130, Appendix E	36	Consideration of avoidance techniques		X										
4.A.1	185, 186		Interagency cooperation	X											
4.A.2	11	41, 43	MSCP consistency	X											
4.A.3	42	8	California Hiking and Riding Trail	X											
4.A.4	138		Coordinate monitoring efforts	X											
4.B.1	147		Add SDCWF to NGOs			X									
4.B.2	Append. F.14, F.17		Publicize hunt periods Allow hunting in RJER									X			
4.B.2	124, Append. F.17		Establish point of contact with Rancho Jamul Estates – send notices of scheduled hunting days												X
5.A			Figure 14 lacks sufficient detail to be informational to reader	X											
5.B	80		Planting of non-native plants compatibility with MSCP	X											
5.C	139, 164		MSCP Framework Management Plan and MSCP Monitoring Protocols	X											
5.D	95		Eliminate illegal alien traffic										X		
5.E	95, 108, 136		Concern about off road vehicles									X			X
5.F	45, Figure 11	7	Provide No Hunting Buffer Zone around Rancho Jamul Estates												X